

**Statement Supporting the Revision of the Information Collection Procedure  
for the Community Right-to-Know Regulation of the  
Emergency Planning and Community Right-to-Know Act**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection Request**

Community Right-to-Know Reporting Requirements under sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA) – EPA No. 1352.09.

**1(b) Short Characterization**

This information collection request (ICR) was previously approved as OMB No. 2050-0072 through August 31, 2001, for 2,041,500 hours. Section 311 of EPCRA allows the public access to Material Safety Data Sheets (MSDSs) that facilities provide to their employees. The owner or operator of any facility that is required to prepare or have available an MSDS for a hazardous chemical under the Hazard Communication Standard (HCS) of the Occupational Safety and Health Administration (OSHA) must submit an MSDS to the state emergency response commission (SERC), the local emergency planning committee (LEPC), and the local fire department for each hazardous chemical stored on-site in a quantity greater than the reporting threshold. Alternatively, a list of subject chemicals, grouped by hazard type, may be submitted instead. The current reporting threshold is 10,000 pounds unless the chemical is specifically listed as an extremely hazardous substance (EHS) under EPCRA section 302, in which case the reporting threshold becomes 500 pounds or the threshold planning quantity (TPQ), whichever is less. The reporting threshold for gasoline (all grades combined) is 75,000 gallons and for diesel fuel (all grades combined) is 100,000 gallons, when stored entirely underground at retail gas stations that are in compliance with UST regulations.

The submittal of a list of chemicals or MSDSs was a one-time requirement, to be completed by October 17, 1987, for manufacturing facilities that were subject to OSHA HCS at that time. OSHA has revised its standard to include other sectors (non-manufacturers, construction etc.) in 1988 and 1989. So any new facility that become subject to OSHA HCS for a chemical at or above the reporting threshold under section 311, must submit a list of chemicals or MSDSs within three months to the appropriate SERC, LEPC, and local fire department. Also, facilities must submit updates to the list of MSDSs, within three months, when a new hazardous chemical comes on-site above the reporting threshold. If significant new information arises concerning a previously submitted MSDS, a facility must submit a revised MSDS. Additionally, if the SERC or LEPC receives a request from the public, the facility must provide an MSDS, even if the hazardous chemical is stored below the reporting threshold.

Section 312 of EPCRA requires owners and operators of facilities subject to section 311 to annually report the inventories of those chemicals reported under section 311. The Environmental Protection Agency (EPA) is required to publish two emergency and hazardous chemical inventory forms, known as “Tier I” and “Tier II,” for use by these facilities. The Tier I Form provides the minimum amount of information necessary to comply with the section. Any facility that is required to submit an MSDS or list of chemicals under section 311 must submit a Tier I form annually on or before March 1, incorporating the chemicals reported under section 311. Tier I Forms are submitted to the SERC, LEPC,

and local fire department. The Tier II Form, which provides chemical-specific information, is submitted in lieu of the Tier I Form only if specifically requested by the SERC or LEPC.

EPA is proposing to limit the number of chemicals subject to routine reporting under section 312 by establishing an infinite threshold for chemicals that pose minimal hazards and minimal risks for the community and emergency responders.

EPA estimates that 504,000 manufacturing and non-manufacturing facilities would be subject to reporting and recordkeeping requirements under EPCRA sections 311 and 312 with the proposed infinite threshold for low hazard chemicals. The total burden to facilities over the three-year information collection period is estimated to be 4,515,400 hours, at a cost of \$131 million. There are estimated to be 3,466 active SERCs and LEPCs, based on estimates taken from a recent EPA update of its LEPC database. The total burden associated with state and local activities is estimated to be 398,800 hours, at a cost of \$7.8 million. MSDSs, chemical lists, and Tier I Forms are not submitted to EPA. Therefore, no Agency burden is estimated in association with this ICR.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

The authority for these requirements is EPCRA sections 311 and 312 (42 U.S.C. §11011 and §11012).

Section 311 requires the owner or operator of any facility that is required to prepare or have available an MSDS for a hazardous chemical under OSHA regulations to submit an MSDS for each such chemical, or a list of chemicals, to the SERC, LEPC, and local fire department. This submittal allows local emergency planners/responders and the community to have the same information regarding the hazards of a chemical as the facility.

Section 312 requires the same owners or operators of facilities to annually report the inventories of the chemicals reported under section 311. Section 312(g) requires EPA to publish emergency and hazardous chemical inventory forms for use by facilities subject to this section. In final rules published in the *Federal Register* on October 15, 1987, and July 26, 1990, EPA published the two “formats” required under EPCRA, “Tier I” and “Tier II.” Tier I is the minimum amount of information necessary to comply with the section. Using Tier I, facilities aggregate reportable chemicals by hazard type and provide the quantities and locations of the chemicals. The Tier II Form is chemical-specific information and only needs to be submitted (in lieu of the Tier I Form) if specifically requested by the SERC or LEPC.

## **3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Non-Duplication**

Many states have laws that require information similar to that called for by sections 311 and 312 of EPCRA. EPA allows the state program to suffice for reporting provided that the minimum reporting requirements are met. The burden estimate in this ICR also includes burden imposed on facilities that comply with state requirements.

### **3(b) Consultations**

To estimate the burden imposed by EPCRA Sections 311 and 312 regulations, EPA had contacted representatives of several industries, including small to large size facilities, and several local emergency planning committees (LEPCs)(listed below). In certain cases where estimates were not available from other sources, professional judgement was used. EPA also contacted few states to collect estimates of the reduction in the number of facilities and reports with the proposal of infinite threshold for low hazard chemicals. EPA also used the Tier II data (1997) from Pennsylvania.

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### **3(c) Effects of Less Frequent Collection**

The reporting deadlines for sections 311 and 312 are set by statute. EPA has no authority to allow less frequent collection.

### **3(d) General Guidelines**

The collection activities specified in this ICR adhere to the guidelines specified by OMB.

### **3(e) Confidentiality**

The respondent may claim specific chemical identities as trade secrets in reports submitted under section 312 and in the list of chemicals and material safety data sheets submitted under section 311. Such information must be submitted to EPA according to EPCRA sections 322 and 323 (40 CFR Part 350).

All trade secrecy claims submitted to EPA under Title III are handled and stored according to procedures set out in the Interim OSWER Procedures For Protecting Title III Trade Secret Documents. These procedures were developed expressly for Title III trade secrecy claims with the knowledge that these documents are sensitive. Handling and review of documents containing Title III trade secret information is permitted only by persons who have obtained formal clearance to access the information based on a work-related need to engage in these activities. When not being processed or reviewed by authorized individuals, the claim submissions containing trade secret information are stored in restricted access areas. To ensure that appropriate handling procedures are activated and the confidentiality of Title III trade secret submissions is maintained, the Agency attaches a cover sheet to the top of each trade secret document and otherwise marks the document to clearly identify the document as Title III confidential.

### **3(f) Sensitive Questions**

The information gathering activities under this ICR do not involve any sensitive questions.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents/SIC Codes**

Sections 311 and 312 are applicable to all facilities that are required to prepare or have available an MSDS for a hazardous chemical as required under OSHA. This requirement includes all NAICS codes.

Section 1910.1200 of the OSHA regulations currently provides the following exemptions:

- Hazardous wastes regulated under the Solid Waste Disposal Act;
- Tobacco and tobacco products;
- Wood and wood products;
- Articles (as defined by section 1910.1200);
- Food, drugs, cosmetics, or alcoholic beverages in a retail establishment that are packaged for sale to consumers;
- Foods, drugs, or cosmetics intended for personal consumption by employees while in the workplace;
- Any consumer product or hazardous substance as defined by the Consumer Product Safety Act that the employer can demonstrate is used in the workplace in the same manner as normal consumer use and that results in a duration and frequency of exposure that is not greater than exposures experienced by consumers; and

- Any drug, as defined by the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient.

In addition, section 311(e) of EPCRA excludes the following substances:

- Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration;
- Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use;
- Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public;
- Any substance to the extent it is used in a research laboratory, hospital, or other medical facility under the direct supervision of a technically qualified individual; and
- Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

Also, minimum reporting thresholds have been established under sections 311 and 312. A facility must report those hazardous chemicals that are present at the facility at any time at or above the following levels:

- For hazardous chemicals other than EHSs, the reporting threshold is 10,000 pounds.
- For EHSs, 500 pounds or the TPQ, whichever is less.
- For gasoline, 75,000 gallons (all grades combined) and 100,000 gallons for diesel fuel (all grades combined), when stored entirely underground at retail gas stations that are in compliance with UST regulations.

An infinite threshold is being proposed for chemicals that pose minimal hazard or minimal risks. Any facility must report chemicals that are not exempt and that meet the reporting criteria.

#### **4(b) Information Requested**

##### **4(b)(i) Data Items**

Facilities having chemicals subject to section 311 are required to submit MSDSs for these chemicals. These MSDSs are the same as those required under OSHA regulations. A facility can also fulfill its section 311 reporting obligation by submitting a list of chemicals that are subject to the requirements, grouped by the following hazard types: fire, sudden release of pressure, reactivity, immediate health hazard, and acute health hazard.

On or before March 1 of each year, facilities having chemicals that need reporting must submit a Tier I Form. However, the Tier II Form may be submitted in lieu of the Tier I. The Tier I Form includes the following information as required by the statute:

- An estimate in ranges of the maximum amount of hazardous chemicals in each hazardous category present at the facility at any time during the previous year; and
- An estimate in ranges of the average daily amount of hazardous chemicals on-site in each hazard category.

EPA has added the following information by regulation:

- Primary SIC code and Dun and Bradstreet number (added to facilitate entering and sorting the information on a computer);
- Two emergency contacts (added to give SERCs, LEPCs, and local fire departments a contact at the facility who could clarify information at any time, particularly in the event of an emergency);
- Number of days on-site (added to produce a more accurate estimate of the average daily amount, particularly for those chemicals that are on-site for only a short period of time each year); and
- Certification and signature.

Even if Tier II information is not submitted in lieu of Tier I, it must be submitted upon request by the SERC, LEPC, or local fire department. The Tier II Form includes the following information as required by statute:

- The chemical name;
- An estimate in ranges of the maximum daily amount of the hazardous chemical present at the facility at any time;
- An estimate in ranges of the average daily amount of hazardous chemicals present at the facility during the previous year;
- A brief description of the manner of storage of the hazardous chemical; and
- The location of the hazardous chemical within the facility.

EPA has added the following items in its regulations:

- CAS number to identify more accurately each chemical as well as to simplify computer use;

- The physical state to help identify the type of hazard a chemical represents in an emergency;
- The physical and health hazards associated with the chemical;
- Primary SIC code and Dun and Bradstreet number (added to facilitate entering and sorting the information on a computer);
- Two emergency contacts (added to give SERCs, LEPCs, and local fire departments a contact at the facility who could clarify information at any time, particularly in the event of an emergency);
- Number of days on-site (added to produce a more accurate estimate of the average daily amount, particularly for those chemicals that are on-site for only a short period of time each year); and
- Certification and signature.

#### **4(b)(ii) Respondent Activities**

To determine if it is subject to section 311, a new facility must look at inventory records for all of its chemicals that are required to have MSDSs under OSHA Hazard Communication Standard. The facility would also have to review the EHS list to determine if any of its chemicals are subject to a lower reporting threshold.

If the facility determines that it has chemicals that must be reported, it must determine the address of the SERC, LEPC, and local fire department. Copies of the MSDSs for these chemicals may be submitted, or if preferred, the facility may provide a list of the subject chemicals grouped by hazard type. To use the list option, the facility would have to read the MSDS to determine into which of the five hazard types the chemical falls and to identify it on the list.

EPA is proposing to exempt some low hazard chemicals from routine 312 reporting. To complete the Tier I form, the facility would need to determine whether the chemical is on any of the lists subject to 312 reporting and monitor its inventory records for the chemical (to determine the inventory information), add the quantities together for chemicals having the same hazards, and determine the correct code (listed on the Tier I form to report maximum daily amount, average daily amount etc.).

EPA is also proposing that facilities that will be continued to be covered by these regulations, must submit a list of the chemicals, upon request by the SERC or the LEPC, that are no longer required to be routinely reported because of the infinite threshold. This additional information may only be required in the first year after the rule becomes final, to be submitted along with their inventory report.

A site map may be used to show locations of hazardous chemicals, or the facility may choose to provide the general location.

## **5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

No information provided under sections 311 and 312 is sent to EPA except the trade secret claims, which is covered under a separate ICR. All of the information is kept at the state or local level.

### **5(b) Collection Methodology and Management**

EPA does not receive the data; therefore, EPA does not have any special data collection methodology and management. However, to assist SERCs and LEPCs, EPA has provided grants to several states to create an electronic reporting format. Some states have also created databases using their own resources. Facilities in states having the ability to receive section 311 and 312 information electronically are encouraged to use that option.

### **5(c) Small Entity Flexibility**

The burden hours for small businesses are considered to be smaller than those for large facilities because of the reduced number of chemicals present at smaller facilities.

### **5(d) Collection Schedule**

The frequency of collection for these sections of EPCRA is required by statute. Also, facilities are required to report any relevant changes when they occur. The submittal of a list of chemicals or MSDSs under section 311 is a one-time requirement, unless significant new information arises concerning a previously submitted MSDS, in which case, a facility should submit a revised MSDS. Facilities must submit updates to the list or MSDSs, within three months, when a new hazardous chemical comes on-site above the reporting threshold. The facilities subject to section 312 are required to submit either Tier I or Tier II on or before March 1 annually.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

### **6(a) Estimating Respondent Burden**

EPA estimated the respondent burden hours and costs associated with all recordkeeping and reporting requirements of EPCRA sections 311 and 312.

The previous ICR estimated that approximately 560,000 facilities were subject to the requirements of EPCRA sections 311 and 312. EPA estimates that the exclusion of low hazard chemicals will lead to a ten percent reduction in the number of facilities reporting, resulting in a universe of 504,000 facilities. An additional ten percent of the facilities are expected to have at least one low hazard chemical and, therefore, need to familiarize themselves with the low hazard rule. An annual growth factor of 0.4 percent was applied to the 83,000 manufacturers in the universe to yield facilities that



are subject to EPCRA section 311 and 312 requirements in the second and third years of the ICR-approval period.<sup>1</sup>

It is important to note that initial reporting burdens for these facilities under EPCRA sections 311 and 312 are assumed to have occurred and are not included in this ICR. This ICR accounts for reporting updates and other periodic reporting and recordkeeping activities that apply to all currently regulated facilities, as well as all initial reporting burdens for new facilities that are expected to become subject to the reporting requirements over the three-year ICR-approval period.

There are estimated to be 3,466 active SERCs and LEPCs, based on estimates taken from EPA's recent update of its LEPC database. These numbers are assumed to remain constant over the three-year ICR-approval period, although consolidations occurring in some states may reduce the total. The estimated burden to complete each reporting and recordkeeping activity is outlined below.

The unit burden estimates associated with this collection for facilities and state and local agencies are presented in Exhibit 1.

### **Read and Understand Regulations**

EPA estimates that 332 newly regulated facilities will need to read and understand the regulations (40 CFR Part 370) in the first year. This estimate is determined by applying the 0.4 percent annual growth rate to the number of manufacturing facilities subject to the regulation as of 2000. Second and third year estimates also assume a 0.4 annual growth rate in the size of the universe of regulated facilities. SERCs and LEPCs are assumed to have already completed the familiarization activities. EPA assumes that it takes an average of 11.0 hours per facility to read and understand regulations in 40 CFR Part 370.

EPA assumes that facilities currently subject to 40 CFR part 370 are already familiar with the regulations. This proposed rule is intended to provide burden relief to these facilities by proposing infinite threshold for chemicals that are not on specific lists. Most facilities are already familiar with these lists since they may be already complying with regulations associated with these lists. Therefore, EPA assumes facilities will have minimal burden to take advantage of the burden reductions in this proposed rule.

EPA estimates that 20 percent of the facilities will need to familiarize themselves with the low hazard rule; this 20 percent includes the ten percent who will no longer be required to report. Most facilities will not need to review the low hazard rule because they have very few chemicals, such as chlorine and sulfur dioxide at water treatment plants, ammonia at refrigeration plants, or fuel oil at industrial sites. These chemicals will not be excluded and, therefore, the facilities will not need to review the new rule.

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<sup>1</sup> To develop this estimate, 1997 U.S. Census data on the number of manufacturing establishments were reviewed. The summary data provided by the Census for changes in the number of manufacturers between 1992 and 1997 differed based on whether NAICS codes or SIC codes were used. The SIC code comparison indicated a growth of about 2 percent over the five years; the NAICS code comparison indicated a decline of almost 5 percent. To be conservative, EPA applied the 2 percent rate, adjusted to 0.4 percent annually.

**Section 311: MSDS Reporting for Facilities (40 CFR 370.21)**

The MSDS reporting burden only applies to the facility respondent universe. EPA estimates that 332 newly regulated facilities will need to determine which chemicals exceed the threshold limits and calculate quantities for mixtures for the MSDS reporting requirements in the first year. Of this universe, 34 percent (113 facilities in the first year) will submit MSDSs to LEPCs, SERCs, and local fire departments. Alternatively, facilities may submit a list of hazardous chemicals grouped by hazard category or a list of the chemical or common names of each hazardous chemical in lieu of submitting an MSDS. Sixty-six percent (218 facilities in the first year) are expected to submit such lists. The percentages were determined from an analysis of the information collected for the *1991 State Title III Status Report*.

Information Collection Activity	Annual Hours Burden				Total Hours	Annual Cost
	Legal	Management	Technical	Clerical	Burden	
<b>RULE FAMILIARIZATION (Facilities)</b>						
Read and understand regulations at 40 CFR Part 370	1.00	2.50	7.50	0.00	11.00	\$423
<b>MSDS REPORTING (370.21) (Facilities)</b>						
Basic Reporting						
Determine which chemicals meet/exceed MTLs	0.00	0.25	0.90	0.00	1.15	\$37
Calculate quantity for mixtures	0.00	0.50	1.80	0.00	2.30	\$73
Submit MSDSs to SERC, LEPC, and fire department	0.00	0.08	0.17	0.08	0.33	\$10
Alternative Reporting						
Submit list of hazardous chemicals grouped by hazard category	0.00	0.00	1.00	0.08	1.08	\$30
Submit revised MSDSs	0.00	0.08	0.17	0.08	0.33	\$9
Submit new MSDSs	0.00	0.08	0.17	0.08	0.33	\$9
Additional Reporting						
Submit MSDS upon request	0.00	0.08	0.17	0.08	0.33	\$9
<b>INVENTORY REPORTING (370.25) (Facilities)</b>						
Rule familiarization with low hazard rule			1		1	\$26
Basic Reporting						
Develop and submit Tier I inventory form annually	0.08	0.25	2.34	0.08	2.75	\$81
Alternative Reporting						
Develop and submit Tier II inventory form, in lieu of Tier I form,	0.08	0.25	2.34	0.08	2.75	\$81
Additional Reporting						
Submit Tier II form to LEPC, SERC, and fire department upon request	0.00	0.25	2.34	0.08	2.67	\$73
Provide specific location to fire department upon request	0.00	0.00	0.50	0.08	0.58	\$15
Provide list of low hazard chemicals on request	0.00	0.00	0.40	0.08	0.48	\$12
<b>INFORMATION REQUESTS (370.30) (State and local governments)</b>						
File and maintain annual inventory forms and data	0.00	0.00	5	27.25	32.25	\$628
Input data and maintain database of 312 data	0.00	0.00	40	280	320	\$6,176
Provide MSDSs upon written request	0.00	0.00	0.50	0.17	0.67	\$16
Provide Tier II information upon written request	0.00	0.00	0.50	0.17	0.67	\$16



Information Collection Activity	Number of Respondents	Legal	Annual Hours Burden Management	Technical	Clerical	Total Hours Burden	Annual Cost
<b>RULE FAMILIARIZATION (Facilities)</b>							
Read and understand regulations at 40 CFR Part 370	332	332	831	2,493	0	3,657	\$140,640
<b>Subtotal</b>						<b>3,657</b>	<b>\$140,640</b>
<b>MSDS REPORTING (370.21) (Facilities)</b>							
Basic Reporting							
Determine which chemicals meet/exceed MTLs	332	0	83	299	0	382	\$12,165
Calculate quantity for mixtures	332	0	166	598	0	765	\$24,331
Submit MSDSs to SERC, LEPC, and fire department	113	0	9	19	9	37	\$1,101
Alternative Reporting							
Submit list of hazardous chemicals grouped by haz. type	218	0	0	218	17	235	\$6,548
Supplemental Reporting							
Submit revised MSDSs	25,199	0	2,016	4,284	2,016	8,316	\$223,333
Submit new MSDSs	25,199	0	2,016	4,284	2,016	8,316	\$223,333
Additional Reporting							
Submit MSDS upon request	5,040	0	403	857	403	1,663	\$44,667
<b>Subtotal</b>						<b>19,714</b>	<b>\$535,477</b>
<b>INVENTORY REPORTING (370.25) (Facilities)</b>							
Rule familiarization for low hazard rule	111,920	0	0	111,920	0	111,920	\$2,952,696
Basic Reporting							
Develop and submit Tier I inventory form annually	201,589	16,127	50,397	471,718	16,127	554,370	\$16,231,055
Alternative Reporting							
Develop and submit Tier II form, in lieu of Tier I, annually	302,383	24,191	75,596	707,577	24,191	831,554	\$24,346,582
Additional Reporting							
Submit Tier II to LEPC, SERC, and fire dept. upon request	20,159	0	5,040	47,172	1,613	53,824	\$1,461,834
Provide specific location to fire department upon request	5,040	0	0	2,520	403	2,923	\$73,357
Provide list of low hazard chemicals on request	5,040	0	0	2,016	403	2,419	\$60,061
<b>Subtotal</b>						<b>1,557,011</b>	<b>\$45,125,585</b>
<b>Total (Facilities)</b>						<b>1,580,381</b>	<b>\$45,801,702</b>
<b>INFORMATION REQUESTS (370.30) (State and local governments)</b>							
File and maintain annual inventory forms and data	3,466	0	0	17,330	94,449	111,779	\$2,178,000
Input data and maintain database of 312 data	45	0	0	1,800	12,600	14,400	\$278,000
Provide MSDS on written request	5,040	0	0	2,520	857	3,377	\$78,300
Provide Tier II information upon written request	5,040	0	0	2,520	857	3,377	\$78,300
<b>Total (State and local governments)</b>						<b>132,932</b>	<b>\$2,612,715</b>

Information Collection Activity	Number of Respondents	Legal	Annual Hours Burden			Total Hours Burden	Annual Cost
RULE FAMILIARIZATION (Facilities)							
Read and understand regulations at 40 CFR Part 370	334	334	834	2,503	0	3,671	\$141,203
<b>Subtotal</b>						<b>3,671</b>	<b>\$141,203</b>
MSDS REPORTING (370.21) (Facilities)							
Basic Reporting							
Determine which chemicals meet/exceed MTLs	334	0	83	300	0	384	\$12,214
Calculate quantity for mixtures	334	0	167	601	0	768	\$24,428
Submit MSDSs to SERC, LEPC, and fire department	113	0	9	19	9	37	\$1,110
Alternative Reporting							
Submit list of hazardous chemicals grouped by haz. type	220	0	0	220	18	238	\$6,616
Supplemental Reporting							
Submit revised MSDSs	25,215	0	2,017	4,287	2,017	8,321	\$223,481
Submit new MSDSs	25,215	0	2,017	4,287	2,017	8,321	\$223,481
Additional Reporting							
Submit MSDS upon request	5,043	0	403	857	403	1,664	\$44,696
<b>Subtotal</b>						<b>19,733</b>	<b>\$536,026</b>
INVENTORY REPORTING (370.25) (Facilities)							
Basic Reporting							
Develop and submit Tier I inventory form annually	201,722	16,138	50,431	472,031	16,138	554,737	\$16,241,804
Alternative Reporting							
Develop and submit Tier II form, in lieu of Tier I, annually	302,584	24,207	75,646	708,046	24,207	832,105	\$24,362,706
Additional Reporting							
Submit Tier II to LEPC, SERC, and fire dept. upon request	20,172	0	5,043	47,203	1,614	53,860	\$1,462,802
Provide specific location to fire department upon request	5,043	0	0	2,522	403	2,925	\$73,405
<b>Subtotal</b>						<b>1,443,627</b>	<b>\$42,140,717</b>
<b>Total (Facilities)</b>						<b>1,467,031</b>	<b>\$42,817,946</b>
INFORMATION REQUESTS (370.30) (State and local governments)							
File and maintain annual inventory forms and data	3,466	0	0	17,330	94,449	111,779	\$2,178,277
Input data and maintain database of 312 data	45	0	0	1,800	12,600	14,400	\$277,920
Provide MSDS on written request	5,043	0	0	2,522	857	3,379	\$78,311
Provide Tier II information upon written request	5,043	0	0	2,522	857	3,379	\$78,311
<b>Total (State and local governments)</b>						<b>132,936</b>	<b>\$2,612,818</b>

Information Collection Activity	Number of Respondents	Legal	Annual Hours Burden			Total Hours Burden	Annual Cost
RULE FAMILIARIZATION (Facilities)							
Read and understand regulations at 40 CFR Part 370	334	334	835	2,505	0	3,674	\$141,307
<b>Subtotal</b>						<b>3,674</b>	<b>\$141,307</b>
MSDS REPORTING (370.21) (Facilities)							
Basic Reporting							
Determine which chemicals meet/exceed MTLs	334	0	84	301	0	384	\$12,223
Calculate quantity for mixtures	334	0	167	601	0	768	\$24,446
Submit MSDSs to SERC, LEPC, and fire department	114	0	9	19	9	37	\$1,111
Alternative Reporting							
Submit list of hazardous chemicals grouped by haz. type	220	0	0	220	18	238	\$6,608
Supplemental Reporting							
Submit revised MSDSs	25,232	0	2,019	4,289	2,019	8,327	\$223,629
Submit new MSDSs	25,232	0	2,019	4,289	2,019	8,327	\$223,629
Additional Reporting							
Submit MSDS upon request	5,046	0	404	858	404	1,665	\$44,726
<b>Subtotal</b>						<b>19,746</b>	<b>\$536,372</b>
INVENTORY REPORTING (370.25) (Facilities)							
Basic Reporting							
Develop and submit Tier I inventory form annually	201,857	16,149	50,464	472,344	16,149	555,105	\$16,252,596
Alternative Reporting							
Develop and submit Tier II form, in lieu of Tier I, annually	302,785	24,223	75,696	708,516	24,223	832,658	\$24,378,894
Additional Reporting							
Submit Tier II to LEPC, SERC, and fire dept. upon request	20,186	0	5,046	47,234	1,615	53,896	\$1,463,774
Provide specific location to fire department upon request	5,046	0	0	2,523	404	2,927	\$73,454
<b>Subtotal</b>						<b>1,444,586</b>	<b>\$42,168,718</b>
<b>Total (Facilities)</b>						<b>1,468,006</b>	<b>\$42,846,397</b>
INFORMATION REQUESTS (370.30) (State and local governments)							
File and maintain annual inventory forms and data	3,466	0	0	17,330	94,449	111,779	\$2,178,277
Input data and maintain database of 312 data	45	0	0	1,800	12,600	14,400	\$277,920
Provide MSDS on written request	5,046	0	0	2,523	857	3,381	\$78,363
Provide Tier II information upon written request	5,046	0	0	2,523	858	3,381	\$78,352
Total (State and local governments)						<b>132,940</b>	\$2,612,912

Activity	Capital/Start-up Costs			O&M Costs		
	First Year	Second Year	Third Year	First Year	Second Year	Third Year
Maintain records	\$235	\$233	\$233			
Submit MSDSs to SERC, LEPC, and fire department				\$1,100	\$1,100	\$1,100
Submit list of hazardous chemicals grouped by haz. type				\$2,200	\$2,200	\$2,200
Submit revised MSDSs				\$252,000	\$252,000	\$252,000
Submit new MSDSs				\$252,000	\$252,000	\$252,000
Submit MSDS upon request				\$25,200	\$25,200	\$25,200
Develop and submit Tier I inventory form annually				\$2,016,000	\$2,017,000	\$2,019,000
Develop and submit Tier II form, in lieu of Tier I, annually				\$3,024,000	\$3,026,000	\$3,028,000
Submit list of low hazard chemicals on request				\$50,400		
Submit Tier II to LEPC, SERC, and fire dept. upon request				\$100,800	\$100,900	\$100,900
Provide specific location to fire department upon request				\$25,200	\$25,200	\$25,200
<b>Total Facilities</b>	<b>\$235</b>	<b>\$233</b>	<b>\$233</b>	<b>\$5,749,000</b>	<b>\$5,702,000</b>	<b>\$5,706,000</b>
Maintain Files	\$666	\$662	\$662			
Provide MSDSs upon written request				\$25,200	\$25,200	\$25,200
Provide Tier II information upon written request				\$25,200	\$25,200	\$25,200
<b>Total SERCs/LEPCs</b>	<b>\$666</b>	<b>\$662</b>	<b>\$662</b>	<b>\$50,400</b>	<b>\$50,400</b>	<b>\$50,500</b>



